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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

IN RE: SOCIAL MEDIA ADOLESCENT  
ADDICTION/PERSONAL INJURY  
PRODUCTS LIABILITY LITIGATION

Case No. 4:22-MD-03047-YGR  
MDL No. 3047

This Document Relates to:  
*M.C., on behalf of minor E.C. v. Meta Platforms, Inc. et al. 4:23-cv-03398*

*D.S. filed on behalf of S.C. v. Meta Platforms, Inc., et al., 4:23-cv-03402*

*B.B filed on behalf of minor R.B. v. M  
Platforms, Inc. et al. 4:23-cv-03037*

*M.W., filed on behalf of Minor G.W. v.  
Meta Platforms, Inc. et al. 4:23-cv-03824*

*Monica Jackson, an individually and on behalf of her minor child M.J. v. Meta*

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE UNDER SEAL  
EXHIBIT IN SUPPORT OF PLAINTIFFS'  
THIRD CONSOLIDATED *EX PARTE*  
APPLICATION FOR APPOINTMENT OF  
GUARDIANS *AD LITEM***

1       *Platforms. Inc., et al. 4:23-cv-03774*

2       *E.S. individually and on behalf of E.S. and*  
 3       *J.S. individually v. Meta Platforms, Inc., et*  
 4       *al. 4:23-cv-03682*

5       *N.B., individually and on behalf of H.B. v.*  
 6       *Meta Platforms, Inc., et al. 4:23-cv-03635*

7       *M.H. individually and on behalf of B.H.*  
 8       *and E.H., individually v. Meta Platforms*  
 9       *Inc., et al. 4:23-cv-03639*

10      *L.T. on behalf of C.A. v. Meta Platforms*  
 11     *Inc., et al. 4:23-cv-03637*

12      Pursuant to Civil Local Rules 7-11 and 79-5(c), Plaintiffs respectfully move for  
 13     administrative relief to file under seal the individual *Ex Parte* Applications for Appointment of  
 14     Guardians *Ad Litem* (“Applications”) described in Plaintiffs’ Third Consolidated *Ex Parte*  
 15     Application for Appointment of Guardians *Ad Litem* (“*Ex Parte Application*”) and attached as  
 16     Exhibits 1-9 to the Declaration of Jennie Lee Anderson in Support of Plaintiffs’ Third  
 17     Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* (“Anderson  
 18     Declaration”).

19      The Applications for which sealing is sought are:

- 20      • *M.C., on behalf of minor E.C. v. Meta Platforms, Inc., et al., 4:23-cv-03398*  
 21        (Exhibit 1);
- 22      • *D.S. filed on behalf of S.C. v. Meta Platforms, Inc., et al., 4:23-cv-03402*  
 23        (Exhibit 2);
- 24      • *B.B filed on behalf of minor R.B. v. Meta Platforms, Inc., et al., 4:23-cv-03032*  
 25        (Exhibit 3);
- 26      • *M.W., filed on behalf of minor G.W. v. Meta Platforms, Inc., et al., 4:23-cv-03824*  
 27        (Exhibit 4);
- 28      • *Monica Jackson, an individually and on behalf of her minor child M.J. v. Meta*  
 29        *Platforms, Inc., et al., 4:23-cv-03774* (Exhibit 5);

- *E.S. individually and on behalf of E.S. and J.S. individually v. Meta Platforms, Inc., et al.*, 4:23-cv-03682 (Exhibit 6);
- *N.B., individually and on behalf of H.B. v. Meta Platforms, Inc., et al.*, 4:23-cv-03635 (Exhibit 7);
- *M.H. individually and on behalf of B.H. and E.H., individually v. Meta Platforms, Inc., et al.*, 4:23-cv-03639 (Exhibit 8);
- *L.T. on behalf of C.A. v. Meta Platforms, Inc., et al.*, 4:23-cv-03637 (Exhibit 9);

This motion is accompanied by a proposed order and the Declaration of Jennie Lee Anderson In Support of Plaintiffs' Administrative Motion to File Under Seal Exhibit to the Declaration of Jennie Lee Anderson in Support of Plaintiffs' Third Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem* ("Anderson Decl. ISO Admin Motion") pursuant to Civil Local Rules 7-11 and 7-12. *See* Civ. L. R. 79-5(c).

This Court previously considered and finding good cause granted Plaintiffs' request to seal applications for guardian *ad litem* in this case. ECF No. 16.

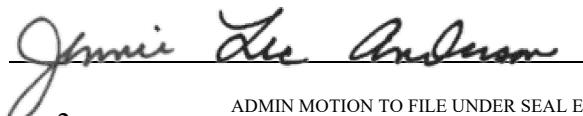
Pursuant to Civil Local Rule 7-11, Liaison Counsel for Plaintiffs asked Defendants for, and Defendants agreed to, a standing stipulation that Applications may be filed under seal. Liaison Counsel for Defendants confirmed that Defendants will so stipulate, but do not waive, and expressly reserve, their right to seek an order or orders in the future to unseal individual applications and/or require parents who wish to proceed pseudonymously going forward make a showing of good cause. Anderson Decl. ISO Admin. Mot. to Seal, ¶5.

For the reasons set forth above, Plaintiffs respectfully request that the Court enter the [Proposed] Order Granting Plaintiffs' Administrative Motion to File Under Seal Exhibit In Support of Plaintiffs' Third Consolidated *Ex Parte* Application for Appointment of Guardians *Ad Litem*.

Dated: August 7, 2023

Respectfully submitted,

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